



PECO NUCLEAR

A Unit of PECO Energy

10 CFR 50.55a

PECO Energy Company
965 Chesterbrook Boulevard
Wayne, PA 19087-5691

July 21, 1997

Docket Nos. 50-277
50-278
50-352
50-353

License Nos. DPR-44
DPR-56
NPF-39
NPF-85

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

Subject: Peach Bottom Atomic Power Station, Units 2 and 3
Limerick Generating Station, Units 1 and 2
Submittal of Relief Request Concerning VT-2 Examiners

Dear Sir:

Attached for your review and approval is a relief request concerning VT-2 examiners for the Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3, and the Limerick Generating Station, Units 1 and 2 Inservice Inspection (ISI) Programs. A discussion of the basis for relief is contained in the attached relief request. We request that this relief be approved by January 21, 1998.

If you have any questions, please contact us.

Very truly yours,

G. A. Hunger, Jr.

G. A. Hunger, Jr.
Director - Licensing

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Enclosure

cc: H. J. Miller, Administrator, Region I, USNRC
W. L. Schmidt, USNRC Senior Resident Inspector, PBAPS
N. S. Perry, USNRC Senior Resident Inspector, LGS

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PEACH BOTTOM ATOMIC POWER STATION, UNITS 2 AND 3
LIMERICK GENERATING STATION, UNITS 1 AND 2

Plant	Unit	Interval	Code
Peach Bottom	2	2 nd	1980 Edition through Winter 1981 Addenda
Peach Bottom	3	2 nd	1980 Edition through Winter 1981 Addenda
Limerick	1	2 nd	1986 Edition
Limerick	2	1 st	1986 Edition

I. IDENTIFICATION OF COMPONENTS

none

II. CODE REQUIREMENTS FROM WHICH RELIEF IS REQUESTED

ASME Section XI, IWA-2300, requires that personnel performing VT-2 visual examinations be qualified in accordance with comparable levels of competency as defined in ANSI N45.2.6. Additionally, IWA-2300 requires the examination personnel shall have natural or corrected near distance vision acuity, in at least one eye, equivalent to a Snellen fraction of 20/20. For far vision, personnel shall have natural or corrected far distance visual acuity of Snellen 20/30 or equivalent. These examination personnel shall also have a color vision examination to verify the capability to distinguish color and differentiating contrast between the colors used in the applicable method. Personnel vision examinations shall be conducted annually.

PECO Energy requests approval to implement Code Case N-546, "Alternative Requirements for Qualification of VT-2 Examination Personnel," which is not yet approved by reference in Regulatory Guide 1.147.

III. BASIS FOR RELIEF

Code Case N-546 allows experienced plant personnel such as licensed and nonlicensed operators, local leak rate personnel, system engineers, and inspection and nondestructive examination personnel to perform VT-2 visual examinations without having to be certified to comparable levels of competency defined in ANSI N45.2.6. The PECO Energy Company individuals performing the visual examinations will be subject to the conditions provided in Code Case N-546.

Specifically, the examination personnel will have at least 40 hours of plant walkdown experience, receive a minimum of four hours of training on Section XI requirements and plant specific procedures for VT-2 visual examinations, and will pass the vision test requirements of IWA-2321, 1995 edition. In addition to the requirements in Code Case N-546, PECO Energy Company has procedures to assure that consistent VT-2 visual examinations are performed. PECO Energy Company will continue to document the qualifications, training, and visual acuity of persons selected to perform the VT-2 examinations and maintain records that verify all of the requirements in the Code Case as specified herein, are met. This alternative to the current code requirements alleviates the need to contract certified VT-2 personnel to perform these examinations and reduces the administrative burden of maintaining an extensive Section XI qualification and certification program for VT-2 examination personnel.

IV. ALTERNATE PROVISIONS

PECO Energy Company will meet the requirements contained in Code Case N-546. Additionally, PECO Energy Company has formal procedures so that consistent VT-2 visual examinations are performed, and will document and maintain records to verify that persons selected as VT-2 examiners are qualified. Use of this code case will provide a comparable level of quality and safety to that currently in place for VT-2 visual examinations.